

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JENNIFER REBOLLO,)
)
Plaintiff,) Case No.
)
vs.) St. Louis County Associate Circuit Court
) Cause No: 12SL-AC16929, Division 32M
NCB MANAGEMENT SERVICES, INC.,)
) **JURY DEMAND REQUESTED**
Defendant.)

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441(b), and 1446, Defendant NCB Management Services, Inc. ("NCB"), by its attorney, hereby removes this action from the 21st Judicial Circuit Court of St. Louis County, Missouri to the United States District Court for the Eastern District of Missouri. In support of this Notice of Removal, NCB states as follows:

1. Plaintiff Jennifer Rebollo originally commenced this action by filing a Complaint against NCB in the 21st Judicial Circuit Court of St. Louis County, Missouri where it is presently captioned as *Jennifer Rebollo v. NCB Management Services, Inc.* Docket No.: 12SL-AC16929. No further proceedings before the State court have occurred.

2. In the Complaint, plaintiff alleges federal statutory causes of action against NCB. A copy of all process, pleadings and orders served upon NCO in the State Court Action is being filed with this Notice and is attached hereto as Exhibit "A".

3. Plaintiff accuses NCB of violating the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §1692 et seq. and the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. §227 et seq.

4. NCB was served with Plaintiff's Summons and Complaint on or about May 31, 2012.

5. This Court has original federal question jurisdiction over Plaintiff's FDCPA and TCPA claims pursuant to 28 U.S.C. §1331, 28 U.S.C. § 1441 and 15 U.S.C. § 1692(k).

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which NCB was served with Plaintiff's Complaint. See, 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the 21st Judicial Circuit Court of St. Louis County, Missouri. See Exhibit "B.

8. Written notice of this Notice of Removal of this action is being caused to be served on counsel for the Plaintiff.

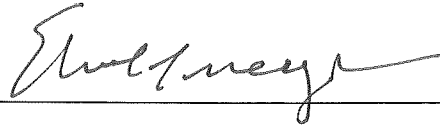
WHEREFORE, Defendant NCB Management Services, Inc. gives notice that this action is removed from the 21st Judicial Circuit Court of St. Louis County, Missouri to the United States District Court for the Eastern District of Missouri.

Respectfully submitted,



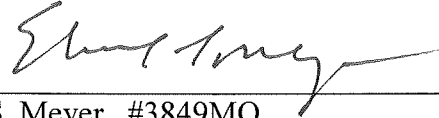
Edward S. Meyer #25112
PITZER SNODGRASS, P.C.
Attorney for Defendant NCB Management
Services, Inc.
100 South Fourth Street, Suite 400
St. Louis, Missouri 63102-1821
(314) 421-5545
(314) 421-3144 (Fax)
Email: meyer@pspclaw.com

I hereby certify that a copy of the foregoing was filed electronically with the Clerk of the Court this 20th day of June, 2012 to be served by operation of the Court's electronic filing system upon the following and via U.S. Certified Mail on this 20th day of June, 2012: **James W. Eason, Rick A. Voytas, EASON & VOYTAS, LLC, Attorneys for Plaintiff, 1 N. Taylor Ave., St. Louis, MO 63108.**



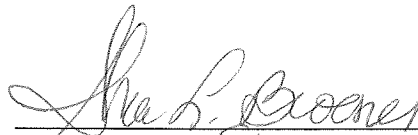
STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Edward S. Meyer, first duly sworn upon his oath, states that he is agent and attorney for Defendant NCB Management Services, Inc. in this behalf; that he has read the foregoing Removal Notice and knows the contents thereof; and that the statements therein contained are true to the best of his knowledge, information and belief.



Edward S. Meyer #3849MO
PITZER SNODGRASS, P.C.
Attorney for Defendant NCB Management Services,
Inc.
100 South Fourth Street, Suite 400
St. Louis, Missouri 63102-1821
(314) 421-5545
(314) 421-3144 (Fax)

Subscribed and sworn to before me this 20th day of June, 2012.



Notary Public Sharon L. Brooner

My Commission Expires: 7/12/2015

